

[Submitting Counsel on Signature Page]

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

People of the State of California, et al.

v.

Meta Platforms, Inc., Instagram, LLC, Meta
Payments, Inc., Meta Platforms Technologies,
LLC

Office of the Attorney General, State of Florida,
Department of Legal Affairs

v.

Meta Platforms, Inc., Instagram, LLC., Meta
Payments, Inc.

State of Montana, *ex rel.* Austin Knudsen, Attorney
General

v.

Meta Platforms, Inc., Instagram, LLC, Facebook
Holdings, LLC, Facebook Operations, LLC, Meta
Payments, Inc., Meta Platforms Technologies, LLC,
Siculus, Inc.

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

4:23-cv-05448; 4:23-cv-05885; 4:24-cv-00805

MDL No. 3047

Case No.: 4:23-cv-05448-YGR
4:23-cv-05885-YGR
4:24-cv-00805-YGR

**STATE ATTORNEYS GENERAL'S
SECOND ADMINISTRATIVE MOTION
FOR LEAVE TO FILE SUPPLEMENTAL
INFORMATION**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Under Civil Local Rule 7-11 and 7-3(d), the State Attorneys General (“State AGs”) submit this Second Administrative Motion for Leave to File Supplemental Information to bring to the Court’s attention additional relevant events occurring since the State AGs and Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (“Meta”) submitted their Joint Statement and Joint Supplemental Letter Brief Regarding State Agency Discovery, *see* Dkt. Nos. 685, 736, and since the Court heard oral argument on March 21, 2024 and May 6, 2024.

On July 24, 2024, the State AGs filed their Administrative Motion for Leave to File Supplemental Information, Dkt. No. 1031, alerting the Court that Meta had provided notice of its intent to serve subpoenas to 26 state agencies. Since that time, Meta has provided notice of its intent to serve subpoenas on an additional 57 state agencies, including three agencies added since the Joint Discovery Management Conference Statement was filed on August 2, 2024.

Attached as Exhibit A is Meta’s July 29, 2024 Notice of Intent to Serve Subpoenas on 26 agencies. Attached as Exhibit B is Meta’s July 30, 2024 Notice of Intent to Serve Subpoenas on two agencies. Attached as Exhibit C is Meta’s July 31, 2024 Notice of Intent to Serve Subpoenas on twelve agencies. Attached as Exhibit D is Meta’s August 1, 2024 Notice of Intent to Serve Subpoenas on fourteen agencies. Attached as Exhibit E is Meta’s August 9, 2024 Notice of Intent to Serve Subpoenas on three agencies.

Meta’s subpoenas directed to state agencies differ from Meta’s earlier Requests for Production of Documents served on the State AGs which had purported to demand the State AGs to produce documents in the possession of numerous state agencies, including these agencies. The subpoenas contain new requests directed to the agencies, while also repeating a subset of the prior Requests for Production of Documents.

Below is a list of each entity to which Meta has indicated it intends to issue a subpoena as of the date of this Motion, which encompass entities in each of the 35 states of State AGs whose enforcement actions are consolidated in this multidistrict litigation. Meta previously identified each of the 83 entities as entities encompassed in the dispute regarding state agency discovery. *See* Dkt. 736-1. The entities are listed in order of Meta’s notices:

- 1 ○ California Department of Child Support Services
- 2 ○ California Department of Education
- 3 ○ California Mental Health Services Oversight and Accountability Commission
- 4 ○ Colorado Behavioral Health Administration
- 5 ○ Colorado Department of Education
- 6 ○ Kentucky Department for Behavioral Health, Developmental and Intellectual Disabilities
- 7 ○ Kentucky Department of Education
- 8 ○ New Jersey Department of Education
- 9 ○ New Jersey Department of Health
- 10 ○ New Jersey Governor's Council on Mental Health Stigma
- 11 ○ Georgia Department of Behavioral Health and Developmental Disabilities
- 12 ○ Georgia Department of Education
- 13 ○ Maine Department of Education
- 14 ○ Maine Department of Health & Human Services
- 15 ○ Maryland Center for School Safety
- 16 ○ Maryland Department of Human Services
- 17 ○ Arizona Department of Child Safety
- 18 ○ Arizona Department of Education
- 19 ○ Arizona Department of Health Services
- 20 ○ Idaho Department of Education
- 21 ○ Idaho Health & Welfare Department
- 22 ○ Commission on Improving the Status of Children in Indiana
- 23 ○ Indiana Department of Education
- 24 ○ Indiana Department of Health
- 25 ○ Louisiana Department of Education
- 26 ○ Louisiana Department of Health
- 27 ○ Connecticut Department of Education

- 1 ○ Connecticut Department of Mental Health and Addiction Services
- 2 ○ Florida Department of Education
- 3 ○ Florida Department of Health
- 4 ○ Hawaii Department of Education
- 5 ○ Hawaii State Council on Mental Health
- 6 ○ Illinois Board of Education
- 7 ○ Illinois Department of Human Services
- 8 ○ Illinois Department of Public Health
- 9 ○ Kansas Department for Children and Families
- 10 ○ Kansas Department of Education
- 11 ○ Kansas Department of Health & Environment
- 12 ○ Michigan Department of Education
- 13 ○ Michigan Department of Health & Human Services
- 14 ○ Minnesota Department of Education
- 15 ○ Minnesota Department of Human Services
- 16 ○ Missouri Department of Elementary and Secondary Education
- 17 ○ Missouri Department of Mental Health
- 18 ○ Nebraska Department of Education
- 19 ○ Nebraska Department of Health and Human Services
- 20 ○ New York Department of Education
- 21 ○ New York Office of Mental Health
- 22 ○ North Dakota Department of Health and Human Services
- 23 ○ North Dakota Department of Public Instruction
- 24 ○ Ohio Department of Education & Workforce
- 25 ○ Ohio Department of Mental Health & Addiction Services
- 26 ○ Ohio Department of Higher Education
- 27 ○ Ohio Department of Health

- 1 ○ Montana Board of Public Education
- 2 ○ Montana Department of Public Health and Human Services
- 3 ○ North Carolina Department of Health and Human Services
- 4 ○ North Carolina Department of Public Instruction
- 5 ○ Oregon Department of Education
- 6 ○ Oregon Department of Human Services
- 7 ○ Rhode Island Department of Behavioral Healthcare, Developmental Disabilities and Hospitals
- 8 ○ Rhode Island Department of Education
- 9 ○ Rhode Island Department of Human Services
- 10 ○ South Carolina Department of Education
- 11 ○ South Carolina Department of Mental Health
- 12 ○ Wisconsin Office of Children's Mental Health
- 13 ○ Delaware Department of Education
- 14 ○ Delaware Department of Health and Social Services
- 15 ○ Pennsylvania Department of Education
- 16 ○ Pennsylvania Department of Human Services
- 17 ○ South Dakota Department of Education
- 18 ○ South Dakota Department of Social Services
- 19 ○ Virginia Department of Behavioral Health and Developmental Services
- 20 ○ Virginia Department of Education
- 21 ○ Virginia Foundation for Healthy Youth
- 22 ○ Washington Department of Children, Youth, and Families
- 23 ○ Washington State Board of Education
- 24 ○ Washington State Department of Social and Health Services
- 25 ○ West Virginia Bureau for Children and Families
- 26 ○ West Virginia Department of Education
- 27 ○ Kentucky Board of Education

- Kentucky Cabinet for Health and Family Services
- Kentucky Department of Public Health.

Additionally, Meta has taken the same approach to discovery from state agencies in *Commonwealth of Massachusetts v. Meta Platforms, Inc.*, Massachusetts Super. Ct. No. 2384CV02397-BLS1, the pending enforcement action brought by the Attorney General of Massachusetts. On August 6, 2024, Meta indicated that it intended to serve third party subpoenas on the following six Massachusetts state entities, which Meta noted “are not named parties” in the suit: Massachusetts Department of Elementary and Secondary Education; Massachusetts Bureau of Family and Community Health; Massachusetts Department of Mental Health; Massachusetts Department of Public Health; Massachusetts Executive Office of Health and Human Services; and Massachusetts Executive Office of Education. A copy of Meta’s notice of intent to serve subpoenas on these agencies is attached as Exhibit F.

The State AGs seek to provide the supplemental information attached as Exhibits A, B, C, D, E and F to ensure a complete and accurate record.

The State AGs have consulted with counsel for Meta, which takes no position on the State AGs’ filing of this Motion.

DATED: August 19, 2024

Respectfully submitted,

PHILIP J. WEISER

Attorney General
State of Colorado

/s/ Bianca E. Miyata

Bianca E. Miyata, CO Reg. No. 42012,
pro hac vice

Senior Assistant Attorney General

Lauren M. Dickey, CO Reg. No. 45773, *pro hac vice*

First Assistant Attorney General

Megan Paris Rundlet, CO Reg. No. 27474

Senior Assistant Solicitor General

Elizabeth Orem, CO Reg. No. 58309

Assistant Attorney General

Colorado Department of Law

Ralph L. Carr Judicial Center

Consumer Protection Section
1300 Broadway, 7th Floor
Denver, CO 80203
Phone: (720) 508-6651
bianca.miyata@coag.gov

*Attorneys for Plaintiff State of Colorado, ex rel.
Philip J. Weiser, Attorney General*

ROB BONTA
Attorney General
State of California

/s/ Megan O'Neill
Nicklas A. Akers (CA SBN 211222)
Senior Assistant Attorney General
Bernard Eskandari (SBN 244395)
Emily Kalanithi (SBN 256972)
Supervising Deputy Attorneys General
Nayha Arora (CA SBN 350467)
Megan O'Neill (CA SBN 343535)
Joshua Olszewski-Jubelirer
(CA SBN 336428)
Marissa Roy (CA SBN 318773)
Brendan Ruddy (CA SBN 297896)
Deputy Attorneys General
California Department of Justice
Office of the Attorney General
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004
Phone: (415) 510-4400
Fax: (415) 703-5480
Megan.ONeill@doj.ca.gov

*Attorneys for Plaintiff the People of the State of
California*

RUSSELL COLEMAN
Attorney General
Commonwealth of Kentucky

/s/ J. Christian Lewis
J. Christian Lewis (KY Bar No. 87109),
Pro hac vice
Philip Heleringer (KY Bar No. 96748),
Pro hac vice

Zachary Richards (KY Bar No. 99209),
Pro hac vice app. forthcoming
Daniel I. Keiser (KY Bar No. 100264),
Pro hac vice
Matthew Cocanougher (KY Bar No. 94292),
Pro hac vice
Assistant Attorneys General
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601
CHRISTIAN.LEWIS@KY.GOV
PHILIP.HELERINGER@KY.GOV
ZACH.RICHARDS@KY.GOV
DANIEL.KEISER@KY.GOV
MATTHEW.COCANOUGH@KY.GOV
Phone: (502) 696-5300
Fax: (502) 564-2698

*Attorneys for Plaintiff the Commonwealth of
Kentucky*

MATTHEW J. PLATKIN

Attorney General
State of New Jersey

/s/ Kashif T. Chand

Kashif T. Chand (NJ Bar No. 016752008),
Pro hac vice
Section Chief, Deputy Attorney General
Thomas Huynh (NJ Bar No. 200942017),
Pro hac vice
Assistant Section Chief, Deputy Attorney
General
Verna J. Pradaxay (NJ Bar No. 335822021),
Pro hac vice
Mandy K. Wang (NJ Bar No. 373452021),
Pro hac vice
Deputy Attorneys General
New Jersey Office of the Attorney General,
Division of Law
124 Halsey Street, 5th Floor
Newark, NJ 07101
Tel: (973) 648-2052
Kashif.Chand@law.njoag.gov
Thomas.Huynh@law.njoag.gov
Verna.Pradaxay@law.njoag.gov
Mandy.Wang@law.njoag.gov

*Attorneys for Plaintiff New Jersey Division of
Consumer Affairs*

ATTESTATION

I, Megan O'Neill, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: August 19, 2024

/s/ Megan O'Neill
MEGAN O'NEILL
Deputy Attorney General